



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

December 30, 2015

The Honorable Rick Alley  
Mayor of the City of White Bird  
212 River Street  
White Bird, Idaho 83554

Subject: Final finding of no significant impact for the City of White Bird wastewater utility improvements project (Wastewater Grant No. 361-2013-3)

Dear Mayor Alley:

A draft finding of no significant impact (FONSI) was issued by the Idaho Department of Environmental Quality (DEQ) on November 2, 2015 for the City of White Bird's (the City's) wastewater utility improvements project based on a careful review of the environmental information document prepared by Mountain Waterworks, Inc.

The draft FONSI was published on November 11, 2015 in the *Idaho County Free Press*, newspaper of record for the City. Comments were received during the 30-day public comment period which followed publication. The final FONSI has been revised to include the comments received and the agency's responses.

This completes the environmental review of this project. Please contact Nicolas Hiebert at the DEQ Lewiston Regional Office, (208) 799-4886, if you have questions regarding the project. Please keep him informed of progress on the project. For questions regarding the environmental review contact Michael Stambulis at (208) 373-0123 or via email at [michael.stambulis@deq.idaho.gov](mailto:michael.stambulis@deq.idaho.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry N. Burnell".

Barry N. Burnell  
Water Quality Division Administrator

BNB:MS:tg

Enclosures

The Honorable Rick Alley  
City of White Bird  
December 30, 2015  
Page 2

c: MaryAnna Peavey, DEQ State Office  
Charlie Parkins, DEQ State Office  
Nicolas Hiebert, DEQ Lewiston Regional Office  
Keri Hill, Mountain Waterworks, Inc. ([khill@mountainwtr.com](mailto:khill@mountainwtr.com))  
Dennis Porter, Idaho Department of Commerce ([Dennis.Porter@commerce.idaho.gov](mailto:Dennis.Porter@commerce.idaho.gov))  
Tony Tenne, Idaho Department of Commerce ([tony.tenne@commerce.idaho.gov](mailto:tony.tenne@commerce.idaho.gov))  
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([Howard.Lunderstadt@id.usda.gov](mailto:Howard.Lunderstadt@id.usda.gov))

## FINDING OF NO SIGNIFICANT IMPACT

**Date:** December 30, 2015

**To:** All Interested Government Agencies, Public Groups, and Individuals

**Subject:** Environmental determination for the City of White Bird's wastewater utility improvements project (Wastewater Grant No. 361-2013-3)

In accordance with the State Environmental Review Process (SERP) and the "Rules for Administration of Wastewater Treatment Facility Grants" (IDAPA 58.01.04), an environmental review has been performed and a finding of no significant impact (FONSI) is hereby issued by the Idaho Department of Environmental Quality (DEQ).

Project:	City of White Bird Wastewater Utility Improvements
Location:	Idaho County, Idaho
DEQ Grant Number:	WWG-361-2013-3
DEQ Grant Costs:	\$31,000
Total Construction Project Cost:	\$837,000

### **PURPOSE/SUMMARY OF IMPACTS:**

**Purpose of Project:** The purpose of the proposed project is to address the City of White Bird's (City's) aging infrastructure and unpermitted discharges. The existing collection system has been shown to have excessive inflow and infiltration and is in need of repairs, and the treatment plant also has aging equipment that requires maintenance and replacement. The selected alternative will address the City's aged infrastructure as well as regulatory compliance with the Environmental Protection Agency (EPA). Improvements are necessary as the facility has been operating since inception without a National Pollutant Discharge Elimination System (NPDES) permit and potentially faces penalties unless action is taken.

**Description of the Project:** The proposed project involves changes to the City's treatment methods, treatment facilities, and collection system. The proposed project includes implementation of "priority 1" collection system improvements; upgrading the current lagoons and disinfection system at the treatment plant; and implementing rapid infiltration as the wastewater disposal method.

**Direct and Indirect Impacts:** An environmental information document (EID) was prepared by Mountain Waterworks, Inc., consulting engineer for the City. Mountain Waterworks, Inc. and DEQ consulted with the appropriate state and federal agencies regarding relevant environmentally sensitive resources. Based on consultation with agency experts, Mountain Waterworks, Inc. and DEQ evaluated the potential short-term and long-term impacts, and the direct, indirect, and cumulative impacts of the wastewater collection and treatment system improvements. The evaluation emphasized site-specific components of the environment that are most likely to be impacted by the construction and operation of the proposed improvements. The results of the project evaluation indicate there will be environmental effects from the referenced project as described below.

Short-term impacts may occur during project construction and include temporary disruption of the collection and treatment system, increased noise, increased dust pollution, increased potential for stormwater runoff, and disruption of localized traffic conditions. The project contractor is responsible for managing the environmental effects and temporary disruptions of the system as follows:

- Air Quality: Temporary dust pollution impacts will be controlled as a condition of the construction specifications in accordance with the “Rules for the Control of Air Pollution in Idaho” (IDAPA 58.01.01.651). IDAPA 58.01.01.651 states that reasonable precautions shall be taken for dust control and suppression by using water or chemicals, applying dust suppressants, covering trucks, paving, and removing materials. In addition to the rule requirements, DEQ recommends that a dust prevention and control plan be implemented during construction of the project that includes best management practices (BMPs) to minimize dust pollution for fugitive dust control. Emergency generators must comply with Reciprocating Internal Combustion Engines National Emission Standards for Hazardous Air Pollutants.
- Stormwater: Stormwater runoff shall be handled through an EPA Stormwater Construction General permit and the development of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP and stormwater BMPs will be implemented prior to, during, and after project construction to reduce the potential for erosion from runoff.
- Cultural Resources: The City of White Bird is located at the site of a former Nez Perce Tribe village and very near the location of the Battle of White Bird Canyon. The project contractor and the City will hire an on-site professional archeologist to monitor work during all collection system trenching and digging activities. If archeological artifacts (such as beads, arrow heads, pottery, fabric, grave goods, glass, metal fragments, or other human-made objects that appear to predate 1960) or human remains (such as bones, bone fragments, or teeth) are inadvertently discovered during construction, ground disturbing activities shall cease and the State Historical Preservation Officer (SHPO) and the Nez Perce Tribal Historic Preservation Office (THPO) will be notified. Mitigation measures will be implemented as directed by the SHPO and the Nez Perce THPO, and work will not resume at the discovery site without their consent.
- Solid Waste/Sludge Management: Sludge removed from the lagoons as part of the proposed project will be disposed of according to IDAPA 58.01.16 and the Federal biosolids rule (Part 503 of Title 40 of the Code of Federal Regulations). As required, a biosolids management plan will be developed, submitted, and approved by DEQ prior to dredging and disposal.
- Noise impacts from the project construction will be reduced by restricting work hours to reasonable times identified in the construction specifications.
- Implement any other appropriate BMPs, wherever possible, to avoid or minimize impacts from other construction activities.

The following permits will be required for this project:

- Land Application Permit from DEQ
- EPA Stormwater Construction General Permit
- Any other local, state, or federal permit required for activities taking place during project construction

**Beneficial Impacts:** Overall, the completion of the proposed project will have long-term positive effects to water quality. The proposed alternative will address the City's significantly aged infrastructure as well as regulatory compliance with the Environmental Protection Agency. The proposed project will also reduce infiltration/inflow into the treatment system; thereby increasing the efficiency and sustainability of the treatment facility.

**Finding:** The review process did not indicate significant environmental impacts would result from the proposed action. Consequently, a decision has been made that an environmental impact statement does not need to be prepared for the proposed project. Instead, a FONSI is hereby issued by DEQ. This decision is made following a careful review of the October 2015 *Environmental Information Document, City of White Bird, Wastewater Utility*, the December 2013 *Wastewater System Draft Facility Plan (for IDEQ Technical Review and Approval), City of White Bird Wastewater System*, and supporting documentation.

#### **AVAILABILITY OF COPIES:**

Copies of the notice of a FONSI, the December 2013 *Wastewater System Draft Facility Plan (for IDEQ Technical Review and Approval), City of White Bird Wastewater System*, the October 2015 *Environmental Information Document, City of White Bird, Wastewater Utility*, and supporting documentation upon which it is based are available for public review on DEQ's website at [www.deq.idaho.gov/public-comment-opportunities](http://www.deq.idaho.gov/public-comment-opportunities) or at the following locations:

Idaho Department of Environmental Quality  
Water Quality Division  
1410 North Hilton  
Boise, Idaho 83706  
Grant SERP contact: Michael Stambulis  
(208) 373-0123

Idaho Department of Environmental Quality  
Lewiston Regional Office  
1118 "F" Street  
Lewiston, Idaho 83501  
Regional Office contact: Nicolas Hiebert  
(208) 799-4370  
Toll-free: (877) 541-3304

City of White Bird  
212 River Street  
White Bird, Idaho 83554  
Contact: Mayor Rick Alley  
(208) 839-2994

The public was informed about the proposed project and their opportunity for comment through the *Idaho County Free Press*, one time in the November 11, 2015 publication.

**Public Comments:** Comments were submitted to DEQ for consideration during the 30-day public comment period. The comments submitted and the agency's responses are attached and are officially part of the City of White Bird's wastewater utility improvement's project record and the final FONSI. The attached document was sent to the following commenter:

Austin Hopkins  
Conservation Assistant  
Idaho Conservation League  
P.O. Box 844  
Boise, ID 83701

A handwritten signature in blue ink, appearing to read "Barry N. Burnell".

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Barry N. Burnell  
Water Quality Division Administrator

**Response to Public Comments Received During the 30 Day Public Comment Period for the  
Draft Finding of No Significant Impact for the City of White Bird Wastewater  
Utility Improvements Project  
December 30, 2015**

The sole commenter on the draft Finding of No Significant Impact (FONSI) was the Idaho Conservation League (ICL). ICL's comments are presented in their entirety as an attachment to this document. Summaries of the comments with associated responses are presented below.

**Comment:** ICL expressed concern that the selected alternative – disposal of wastewater via rapid infiltration (RI) – will not adequately treat wastewater to protect White Bird Creek and the Lower Salmon River. ICL specifically commented on four factors related to the design of the RI basin – temperature, pH, detention time, and available carbon.

**Response:** At this stage of the project, detailed design information has not been developed. The design engineer and the City of White Bird (City) have selected an alternative which appears to suit environmental and economic requirements, based on information available at this time. Additional site investigation will be required in order to obtain information necessary for design, and the design engineer is developing a permitting plan which includes a geotechnical investigation. This FONSI determination does not ensure an RI basin will meet discharge limits established by a draft DEQ-issued recycled water permit or a draft Environmental Protection Agency (EPA)-issued National Pollutant Discharge Elimination System (NPDES) permit, nor is it a guarantee that the proposed system will be able to be permitted under these programs. Should the proposed system be unable to be permitted under these programs, the City will work with the design engineers to select a different alternative, and the environmental review process will be reopened.

As stated in the Recycled Water Rules (IDAPA 58.01.17), RI systems shall be designed such that the beneficial uses of the waters of the state will not be injured. The preliminary engineering report shall include the parameters for the design of the RI systems. The preliminary engineering report must demonstrate how discharges from the proposed RI system will comply with any anticipated permit limits as well as the Ground Water Quality Rule (IDAPA 58.01.11) and the Water Quality Standards (IDAPA 58.01.02).

The City must apply for a recycled water permit, and the City cannot begin facility construction until DEQ issues a recycled water permit. The permit will establish discharge requirements, and the permit application will evaluate the ability of the soils to treat the pollutants in the recycled water, hydrogeologic characteristics of the site such as permeability and infiltration rates, and other relevant information.

The facility plan for the City attempted to address potential permit limits based on currently available information. A Total Maximum Daily Load (TMDL) study has been completed for the Lower Salmon River sub-basin. Currently, White Bird Creek is not listed as an impaired segment. The design engineer applied information from the Lower Salmon River sub-basin TMDL to attempt to anticipate future TMDL requirements for White Bird Creek and permitting requirements for the City's wastewater treatment plant (WWTP).

The design engineer anticipates typical percolate quality for a properly designed and operated RI basin would satisfactorily meet permitting requirements and would be expected to meet current water quality requirements for surface water discharge. Effluent TSS, BOD, pathogens, and ammonia would not impact designated beneficial uses of White Bird Creek and the Lower Salmon River.

**Comment:** It is likely that a geotechnical investigation will elicit a hydrological connection between the proposed RI basins and White Bird Creek given the proximity of this facility to the creek. If such a connection is identified, this facility will essentially be discharging directly into the creek and therefore would require a NPDES permit.

**Response:** If a hydrological connection between the proposed RI basins and White Bird Creek is established and it is determined that an NPDES permit is required, construction cannot begin until the City obtains the required NPDES permit and demonstrates the proposed system will reasonably achieve compliance with the discharge limits established in the NPDES permit.

**Comment:** A drainage system running below all the treatment cells was installed with the original WWTP in order to intercept groundwater and reroute it directly into the creek. This drain runs directly below cells 4 and 5, which are set to be removed to facilitate the RI basin. The presence of this drainage system below the RI basin could expedite the flow of treatment water into the creek, further decreasing detention time and efficacy of treatment processes. There is no mention of this drainage system in either the Plan or EID. If the City and DEQ plans to utilize RI as a treatment method, this drainage system must be addressed and likely removed to ensure it does not serve as a conduit facilitating the discharge of untreated wastewater directly into the creek.

**Response:** The design engineer has indicated he is aware of the presence of the drainage system. The design engineer also indicated the City plans to remove the drainage system as part of this project, and he will include this information within the final facility plan.